

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA

In re:

Pro-Mark Services, Inc.,

Bky. Case No. 24-30167  
Chapter 7

Debtor.

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Erik A. Ahlgren, as Chapter 7 Trustee  
of the Bankruptcy Estate of Pro-Mark Services, Inc.,  
as Administrator of the Pro-Mark  
Services, Inc. Employee Stock Ownership Plan, and  
as Trustee of the Pro-Mark Services, Inc.  
Employee Stock Ownership Trust,

Plaintiff,

v.

Adversary No. 24-07014

Connie Berg, Kyle Berg, Connie Berg Revocable  
Living Trust, Kyle R. Berg Revocable Living Trust,  
Chad DuBois, Mandy Grant, and Miguel Paredes,

Defendants.

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**STIPULATED MOTION TO EXTEND  
RESPONSE PERIOD TO AMENDED COMPLAINT**

1. Plaintiff Erik A. Ahlgren, as Chapter 7 Trustee of the Bankruptcy Estate of Pro-Mark Services, Inc., as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust filed his Adversary Complaint against the Defendants, including Defendant Chad DuBois, and the Court issued a Summons, on August 26, 2024. *Docs. 1 and 2.* Answers to the Adversary Complaint were due by September 25, 2024. *Doc. 2.* Plaintiff filed an Amended Complaint on September 25, 2024, triggering a new response time for Defendant DuBois. *Doc. 11.*

2. Plaintiff and Defendant DuBois have commenced settlement discussions. To facilitate those settlement discussions, Plaintiff and Defendant DuBois hereby move the Court, by stipulation, for an order extending the deadline for Defendant DuBois to file an answer or other response to the Amended Complaint to October 25, 2024.

Dated: October 8, 2024

/e/ Peter D. Kieselbach

Michael Fisco (*Admitted Pro Hac Vice*)  
Peter D. Kieselbach (*Admitted Pro Hac Vice*)  
GREENBURG TRAURIG, LLP  
90 South Seventh St., Suite 3500  
Minneapolis, MN 55402  
Tel: (612) 259-9700  
fiscom@gtlaw.com  
kieselbachp@gtlaw.com  
Counsel for Plaintiff

Dated: October 8, 2024

/e/ Maurice B. VerStandig

Maurice B. VerStandig, Esq.  
The Dakota Bankruptcy Firm  
1630 1st Avenue N  
Suite B PMB 24  
Fargo, North Dakota 58102-4246  
Tel: (701) 394-3215  
mac@dakotabankruptcy.com  
Counsel for Defendant DuBois